

**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

Commonwealth of Pennsylvania,	)	
By Attorney General Josh Shapiro	)	
	)	Case No. 3:CV-17-01814-RDM
<i>Plaintiff,</i>	)	(Hon. Robert D. Mariani)
	)	
v.	)	DEFENDANTS' NOTICE OF
	)	SUPPLEMENTAL AUTHORITY
Navient Corporation, <i>et al.</i> ,	)	
	)	Electronically Filed
<i>Defendants.</i>	)	

**DEFENDANTS' NOTICE OF SUPPLEMENTAL AUTHORITY**

Pursuant to LR 7.36, Defendants hereby provide notice of *Lawson-Ross v. Great Lakes Higher Educ. Corp.*, No. 1:17-CV-00253-MW-GRJ (N.D. Fla. Sept. 20, 2018) (Exhibit "A"). *Lawson-Ross* holds that the Department of Education's ("ED") authoritative interpretation of the Higher Education Act's preemptive effect warrants deference, *see* Dkt. No. 27 (citing *Federal Preemption and State Regulation of [ED]'s Federal Student Loan Programs and Federal Student Loan Servicers*, 83 Fed. Reg. 10619 (Mar. 12, 2018)), and provides additional support for Defendants' motion to dismiss the Commonwealth's state-law claims on preemption grounds, *see* Dkt. No. 24 at 15-19; Dkt. No. 26 at 6-13.

Dated: September 25, 2018

Respectfully submitted,

By: /s/ Daniel T. Brier

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Navient Corporation and  
Navient Solutions, LLC*

**CERTIFICATE OF SERVICE**

I, Daniel T. Brier, hereby certify that a true and correct copy of the foregoing Notice of Supplemental Authority was served upon the following counsel of record via the Court's ECF system on this 25th day of September 2018:

John M. Abel, Esquire  
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/s/ Daniel T. Brier